

Exhibit B

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688

**[PROPOSED] ORDER RE: GOOGLE'S
MOTION FOR PROTECTIVE ORDER**

Judge: Hon. Alex G. Tse
Courtroom: A, 15th Floor
Action Filed: July 14, 2020
Trial Date: Not Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Google's Motion for Protective Order to excuse Google from reviewing and producing documents responsive to Plaintiffs' Requests for Production ("RFP") Nos. 192–246. Having considered the joint letter brief, the Court Orders as follows:

Google has shown that RFP Nos. 192–246 are neither relevant nor proportional to the needs of this case. RFP Nos. 192–246 seek documents from a co-pending but unrelated case in this District, *Brown v. Google*, Case No. 5:20-cv-3664. Plaintiffs have narrowed their request to documents produced in *Brown* and those cross-produced in *Brown* from a different case pending in this District, *Calhoun v. Google*, No. 5:20-cv-05146, that include the terms "WAA," "SWAA," or "Firebase." Google has already responded to 191 RFPs and is in the process of producing responsive documents. The parties have recently filed two other joint letter briefs to resolve their disputes on the appropriate search terms to employ for the 24 agreed-upon and Court-ordered custodians in this case. Therefore, RFP Nos. 192–246 are neither relevant nor proportional to the needs of this case and Google is excused from reviewing the requested documents and producing any that may be responsive. Google's Motion for Protective Order as to Requests Nos. 192–246 is hereby GRANTED.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge